

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING ITS EXCLUSIVE PERIOD
FOR THE FILING OF A CHAPTER 11 PLAN
PURSUANT TO § 1121(D) OF THE BANKRUPTCY CODE

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Global Wound Care Medical Group, a Professional Corporation (the “Debtor”), the debtor and debtor in possession in the above-captioned case (the “Case”), hereby moves (the “Motion”) the United States Bankruptcy Court for the Southern District of Texas (the “Court”), pursuant to § 1121(d) of title 11 of the United States Code, §§ 101 *et seq.* (the “Bankruptcy Code”),² for entry of an order (substantially in the form attached hereto as **Exhibit A**, the “Proposed Order”): (a) extending the periods during which the Debtor has the exclusive right to (i) file a chapter 11 plan (the “Exclusive Filing Period”), and (ii) solicit acceptances thereof (the “Exclusive Solicitation Period,” and together with the Exclusive Filing Period, the “Exclusive Periods”), in each case, by 120 days, from February 18, 2025 and April 21, 2025 to June 18, 2025 and August 19, 2025, respectively, without prejudice to the Debtor’s rights to request further extensions of

¹ The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.

² All references to “§” or “section” herein are to sections of the Bankruptcy Code.



such periods in accordance with § 1121(d);³ and (b) granting the Debtor such other and further relief as is just.⁴

I. PRELIMINARY STATEMENT

1. The Debtor currently has the exclusive right to file a plan and solicit acceptances under § 1121(d). By this Motion, the Debtor seeks to extend the Exclusive Periods by 120 days, from February 18, 2025 and April 21, 2025 to June 18, 2025 and August 19, 2025, respectively, without prejudice to the Debtor's right to request further extensions of such periods. If granted, this would be the first extension of the Exclusive Periods in this Case.

2. The requested relief is justified for multiple reasons discussed below; however the primary reasons are as follows:

- First, as demonstrated by those certain stipulations and extensions on file in this Case [Docket Nos. 87, 95, 112, and 119] (collectively, the "DOJ Stipulation"), the Debtor is negotiating a settlement with the Civil Division of the United States Department of Justice ("DOJ"), on behalf of the United States of America, the United States Department of Health and Human Services ("HHS") and its designated component, the Centers for Medicare and Medicaid Services ("CMS," and collectively with HHS, the "United States"). Resolution of the pending issues with the United States, which issues compelled the Debtor commencing this Case, will enable the Debtor to confirm a plan and bring this Case to a successful conclusion. However, the terms and conditions of that settlement are still being negotiated.

³ Paragraph 30 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* provides that "if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion." By the filing of this Motion prior to the expiration of the Exclusive Filing Period, the Exclusive Filing Period will not expire until the Court resolves the Motion.

⁴ Although the Debtor has not filed an accompanying declaration with this Motion, to the extent the Motion is contested or the Court otherwise deems it appropriate, the Debtor will file an accompanying declaration(s) and make such parties available for cross examination.

- Second, the Debtor is currently formulating a plan of reorganization, and has commenced initial communications with the United States regarding the terms of a plan of reorganization.
- Third, the Debtor recently filed its motion to set a general claims bar date of April 8, 2025, and a governmental claims bar date of April 21, 2025. [Docket No. 115]. After these bar dates pass, the Debtor will need additional time to review filed claims, revise any plan to address such claims, and negotiate the terms and conditions of a plan of reorganization with the United States and other key stakeholders.

3. For these reasons, and as further demonstrated below, including affording the Debtor the full and fair opportunity contemplated by Congress for the Debtor to prosecute a viable, fair, and comprehensive chapter 11 plan and solicit acceptances thereof, the Court should grant the requested relief without prejudice to seek additional extensions.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157(a) and 1334. Venue is proper in this district under 28 U.S.C. § 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

5. The predicates for the relief requested herein are § 1121(d).

III. BACKGROUND

A. General Overview.

6. On October 21, 2024 (the “Petition Date”), the Debtor filed a voluntary petition (the “Petition”) for relief under chapter 11 of the Bankruptcy Code.

7. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to §§ 1107 and 1108.

8. No trustee, examiner, or official committee has been appointed in this Case.

9. A description of the Debtor, its business, and the reasons for commencing this Case are set forth in greater detail in the *Declaration of Ralph Cetrulo in Support of the Chapter 11*

Petition and First Day Motions [Docket No. 8] (the “First Day Declaration”). The First Day Declaration is incorporated by reference herein.

10. On February 7, 2025, the Debtor filed the *Motion of Debtor for Entry of an Order (I) Establishing Deadlines and Procedures for Filing Proofs of Claim; (II) Approving Form and Manner of Notice Thereof; and (III) Granting Related Relief* [Docket No. 115], requesting that the Court enter an order setting April 8, 2025 as the deadline to file general claims and April 21, 2025 as the deadline to file governmental claims, other than the United States’ claim related to the issues with CMS, which extended by the DOJ Stipulation to June 14, 2025.

B. Facts Relevant to this Motion.

11. The Debtor, a professional corporation incorporated in California, is a medical practice that provides wound care services, primarily to elderly patients that receive Medicare. The Medicare Program is a federally funded health insurance program primarily designed to cover medical care for the elderly and disabled.

12. Since the Petition Date, the Debtor has continued to provide essential wound care services to thousands of patients in homes, hospices, and skilled nursing facilities. The Debtor operates in a heavily regulated industry while continuing to treat over 2,000 wounds daily. To achieve the Debtor’s chapter 11 goals and maintain quality services to the Debtor’s patients, the Debtor is required to, *inter alia*, maintain vendor relationships and retain 248 full-time and 36 part-time employees and contracts with 49 medical directors.

13. As described in the First Day Declaration, the Debtor filed the Petition as a result of the suspension of Medicare payments (the “Payment Suspension”), which was an existential threat to the Debtor’s business, as well as to patient care and hundreds of jobs. First Day Declaration at ¶¶28-30.

14. After the Petition Date, with the breathing room afforded by chapter 11 protections, the Debtor and the United States began settlement discussions and entered into the DOJ Stipulation and various extensions to provide time to negotiate a global settlement. [See Docket Nos. 87, 95, 112, and 119]. The Debtor continues to participate in meaningful, good faith negotiations with the

United States, which negotiations are vital to the Debtor's progress towards reorganization.

15. A global resolution of the issues that led to the Payment Suspension and any resulting claims by the United States against the Debtor is integral to finalizing the terms of any plan of reorganization.

IV. RELIEF REQUESTED

16. Pursuant to § 1121(d), the Debtor requests entry of an order: (a) extending the periods during which the Debtor has the exclusive right to (i) file a chapter 11 plan, and (ii) solicit acceptances thereof, in each case, by 120 days, from February 18, 2025 and April 21, 2025 to June 18, 2025 and August 19, 2025, respectively, without prejudice to the Debtor's right to request further extensions of the Exclusive Periods in accordance with § 1121(d); and (b) granting the Debtor such other and further relief as is just.

V. BASIS FOR RELIEF

A. This Court Should Grant the Relief Requested.

17. Section 1121(b) provides for an initial period of 120 days after the commencement of a chapter 11 case during which a debtor has the exclusive right to file a chapter 11 plan. Section 1121(c)(3) provides that if a debtor files a plan within the 120-day Exclusive Filing Period, it has an exclusive period of 180 days after the commencement of the chapter 11 case to obtain acceptances of its plan. The Debtor's initial Exclusive Filing Period and Exclusive Solicitation Period are currently set to expire on February 18, 2025 and April 21, 2025, respectively.

18. Under § 1121(d), the Court may extend the Exclusive Periods for cause. 11 U.S.C. § 1121(d)(1) (“[O]n request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.”).

19. The Bankruptcy Code neither defines the term “cause” for purposes of § 1121(d) nor establishes formal criteria for an extension. The legislative history of § 1121 indicates, however, that it is intended to be a flexible standard to balance the competing interests of a debtor and its

creditors. *See In re Timbers of Inwood Forest Assocs., Ltd.*, 808 F.2d 363, 372 (5th Cir. 1987) (“[A]ny bankruptcy court involved in an assessment of whether ‘cause’ exists should be mindful of the legislative goal behind § 1121.”); *In re Mirant Corp.*, No. 4-04-CV-476-A, 4-04-CV-530-A, 2004 WL 2250986, at *2 (N.D. Tex. Sept. 30, 2004) (“In virtually every case where an extension has been granted, the debtor showed substantial progress had been made in negotiations toward reorganization.”); H.R. Rep. No. 95-595, at 231-32 (1978), reprinted in 1978 U.S.C.C.A.N. 5963 (noting that Congress intended to give Bankruptcy Courts great flexibility to protect a debtor’s interests by allowing a debtor an unimpeded opportunity to negotiate settlement of debts without interference from other parties in interest).

20. The broad discretion conferred on the Court in these circumstances enables the Court to consider a variety of factors to assess the totality of circumstances in each case. *In re Adelphia Commc’ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006) (identifying factors courts consider in determining whether to extend exclusivity); *In re Washington-St. Tammany Elec. Coop., Inc.*, 97 B.R. 852, 854 (E.D. La. 1989) (noting that the decision to extend exclusivity “rests with the discretion of the Court.”); *In re Hoffinger Indus., Inc.*, 292 B.R. 639, 644 (B.A.P. 8th Cir. 2003) (“It is within the discretion of the bankruptcy court to decide which factors are relevant and give the appropriate weight to each.”); *In re Express One Int’l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (listing factors considered by courts).

21. Courts in this district and others have identified the *Adelphia* factors as factors to consider in determining whether cause exists to extend exclusivity. *See, e.g., In re New Millennium Mgmt., LLC*, No. 13-35719-H3-11, 2014 WL 792115, at *6 (Bankr. S.D. Tex. Feb. 25, 2014); *see also In re Borders Grp., Inc.*, 460 B.R. 818, 822 (Bankr. S.D.N.Y. 2011) (evaluating the factors set forth in *Adelphia* to hold that debtor established cause to extend exclusivity). These non-exclusive factors include:

- (i) the size and complexity of the debtor’s case;
- (ii) the necessity for sufficient time to permit the debtor to negotiate a chapter 11 plan and prepare adequate information;
- (iii) the existence of good faith progress towards reorganization;

- (iv) the fact that the debtor is paying its bills as they become due;
- (v) whether the debtor has demonstrated reasonable prospects for filing a viable plan;
- (vi) whether the debtor has made progress in negotiations with its creditors;
- (vii) the amount of time which has elapsed in the case;
- (viii) whether the debtor is seeking an extension of exclusivity in order to pressure creditors to submit to the debtor's reorganization demands; and
- (ix) whether an unresolved contingency exists.

See, e.g., Millennium Mgmt., 2014 WL 792115, at *6; *see also In re Adelpia Commc'ns Corp.*, 352 B.R. at 587 (noting that the factors listed above are "objective factors which courts historically have considered in making determinations of this character").

22. Not all factors are relevant to every case and courts tend to use a relevant subset of the above factors in determining whether cause exists to grant an exclusivity extension in a particular chapter 11 case. *See, e.g., In re Hoffinger Indus., Inc.*, 292 B.R. at 644 ("It is within the discretion of the bankruptcy court to decide which factors are relevant and give the appropriate weight to each."); *In re Serv. Merch. Co., Inc.*, 256 B.R. 744, 751–54 (Bankr. M.D. Tenn. 2000) (finding cause to extend where the debtors established six of the aforementioned factors); *In re Express One Int'l, Inc.*, 194 B.R. at 100-01 (identifying four of the factors as relevant in determining whether "cause" existed to extend exclusivity); *see also In re Dow Corning Corp.*, 208 B.R. 661, 670 (Bankr. E.D. Mich. 1997) ("When the Court is determining whether to terminate a debtor's exclusivity, the primary consideration should be whether or not doing so would facilitate moving the case forward. And that is a practical call that can override a mere toting up of the factors.").

23. Moreover, courts regularly grant a debtor's first request for an extension of the debtor's exclusive period to file a chapter 11 plan. *See In re Apex Pharm., Inc.*, 203 B.R. 432, 441 (N.D. Ind. 1996) ("It is true that during the initial 120-day period in which debtors have an exclusive right to file a plan of reorganization . . . the bankruptcy courts apply a lesser standard in determining whether the burden of showing 'a reasonable possibility of a successful reorganization within a reasonable time' has been satisfied.") (citation omitted); *see also In re Borders Grp., Inc.*, 460 B.R. at 825 (same).

24. Courts in this district have granted similar relief to that requested herein in a number of cases. *See, e.g., In re Steward Health Care System, LLC*, Case No. 24-90213 (CML) (Bankr. S.D. Tex. Sept. 26, 2024) (Docket No. 2693) (granting 60-day extension of the exclusive filing period and 60-day extension of the exclusive solicitation period); *In re Core Sci., Inc.*, Case No. 22-90341 (DRJ) (Bankr. S.D. Tex. June 13, 2023) (Docket No. 962) (granting 90-day extension); *In re Talen Energy Supply, LLC*, Case No. 22-90054 (MI) (Bankr. S.D. Tex. Sept. 27, 2022) (Docket No. 1285) (granting 105-day extension of the exclusive filing period and 45-day extension of the exclusive solicitation period); *In re Seadrill Ltd.*, No. 21- 30427 (Bankr. S.D. Tex. Jul. 1, 2021) (Docket No. 829) (granting 120-day extension); *In re CBL & Assocs. Props., Inc.*, No. 20-35226 (Bankr. S.D. Tex. Mar. 19, 2021) (Docket No. 976) (granting 90-day extension); *In re Fieldwood Energy LLC*, No. 20-33948 (Bankr. S.D. Tex. Jan. 8, 2021) (Docket No. 751) (granting 90-day extension); *In re CEC Entm't, Inc.*, No. 20-33163 (Bankr. S.D. Tex. Nov. 20, 2020) (Docket No. 1303) (granting 90-day extension); *In re NPC Int'l, Inc.*, No. 20-33353 (Bankr. S.D. Tex. Nov. 17, 2020) (Docket No. 1065) (granting 120-day extension); *In re EP Energy Corp.*, No. 19-35654 (Bankr. S.D. Tex. Mar. 31, 2020) (Docket No. 1135) (granting 90-day extension); *In re Sheridan Holding Co. II, LLC*, No. 19-35198 (Bankr. S.D. Tex. Jan. 17, 2020) (Docket No. 287) (granting 180-day extension); *In re GenOn Energy, Inc.*, No. 17-33695 (Bankr. S.D. Tex. Oct. 3, 2017) (Docket No. 840) (granting 180-day extension); *In re CJ Holding Co.*, No. 16-33590 (Bankr. S.D. Tex. Nov. 3, 2016) (Docket No. 675) (granting 120-day extension); *In re SandRidge Energy Inc.*, No. 16-32488 (Bankr. S.D. Tex. Aug. 30, 2016) (Docket No. 800) (granting 120-day extension).

B. Cause Exists to Grant the Relief Requested.

25. An extension of the Exclusive Periods by 120 days is appropriate, in the best interests of the Debtor and its stakeholders, and consistent with the intent and purpose of chapter 11 of the Bankruptcy Code. The requested extensions of the Exclusive Periods are necessary and appropriate to enable the Debtor to finalize negotiations with the United States to resolve the issues that lead to the Payment Suspension, and to pursue a chapter 11 plan framework that will maximize the value of the Debtor's estate for the benefit of all stakeholders.

26. Accordingly, application of each of the factors courts consider when granting extensions to the facts of this Case demonstrates that ample cause exists to grant the extension of the Exclusive Periods requested herein.

(i) The Debtor's Case Is Complex.

27. The Debtor's dispute with the United States requires the Debtor to resolve numerous complex regulatory and legal issues related to the Medicare program and the False Claims Act before it can finalize its chapter 11 plan efforts. Representatives of the Debtor and related entities have been meeting regularly virtually with attorneys representing the United States, and had an in-person meeting in Washington, D.C. with those same attorneys, with the goal of reaching a global settlement between the Debtor and related entities, and the United States.

28. The Debtor operates in a heavily regulated industry while continuing to treat over 2,000 wounds daily. To achieve the Debtor's chapter 11 goals and maintain quality services to the Debtor's patients, the Debtor is required to, *inter alia*, maintain vendor relationships and manage 248 full-time and 36 part-time employees and contracts with 49 medical directors— all while engaging in critical negotiations with the United States and other key stakeholders. These highly complex tasks are essential to the Debtor's successful reorganization.

29. The Case is less than four months old, and given the complexity of the issues to be resolved with the United States, the Debtor's progress to date supports the relief requested in this Motion.

(ii) The Debtor has Demonstrated a Necessity for Additional Time to Permit the Debtor to Negotiate a Chapter 11 Plan and Prepare Adequate Information.

30. In addition to making progress in the Debtor's negotiations with the United States regarding a resolution of the Payment Suspension through a global settlement, the Debtor has made substantive, good faith progress towards formulating a plan of reorganization and preparing adequate information and disclosures related thereto. The Debtor needs additional time to finalize a settlement with the DOJ, which will allow it to resolve issues related to the terms of a plan of reorganization.

31. Also, as mentioned, the Debtor has requested that the Court set April 8, 2025, as the general claims bar date. This proposed bar date has not yet passed and the Debtor will need additional time to evaluate any claims that are filed.

32. Section 1121 aims to provide the Debtor with sufficient time and flexibility to negotiate with its creditors. To that end, the Debtor continues to engage with the DOJ and other key stakeholders on the terms and conditions that will be necessary to formulate what the Debtor anticipates will be a consensual plan of reorganization. Therefore, this factor weighs heavily in support of the Debtor's request for an extension of the Exclusivity Periods.

(iii) The Debtor has Established Good Faith Progress Towards Reorganization.

33. As stated in the First Day Declaration, the Payment Suspension was the existential threat that forced the Debtor to file for chapter 11 protections. First Day Declaration at ¶ 30. These chapter 11 protections, and the subsequent DOJ Stipulation with the United States, have afforded the Debtor with breathing room to participate in meaningful, good faith negotiations with the United States, which negotiations are integral to the Debtor's progress towards reorganization. However, despite good faith efforts by both the Debtor and the United States, a global settlement will not be achieved prior to the expiration of the Exclusivity Periods, and the Debtor requests this Court grant it an extension of the Exclusivity Periods so that the Debtor may continue working towards resolution of the issues with the United States.

34. As set forth above, the Debtor has expended significant time and effort since the Petition Date working in good faith with the United States to address its concerns, all while maintaining the Debtor's business operations, preserving value for the Debtor, its stakeholders, and parties in interest, and, most importantly, protecting the health and wellbeing of the patients who are being treated at their homes, hospices, and skilled nursing facilities.

35. Since the Petition Date, in addition to negotiating with the United States, the Debtor has, among other things:

- promptly completed and filed its schedules of assets and liabilities and statements of financial affairs;

- conducted and concluded the meeting of creditors pursuant to § 341;
- obtained final approval authorizing the Debtor to pay certain prepetition wages, to maintain its insurance program and pay insurance premiums, and to continue using its prepetition cash management system;
- filed a motion to establish deadlines and procedures for filing proofs of claims; and
- analyzed potential resolution of this Case, including issues related to the formulation of a plan of reorganization.

36. Thus, this factor supports the extension of the Exclusive Periods. *See In re Adelphia Commc'ns Corp.*, 352 B.R. at 588 (viewing the good faith progress factor “as one of the more important factors” in the analysis).

(iv) The Debtor is Paying Its Postpetition Bills as They Become Due.

37. The Debtor is paying its postpetition bills as they come due and an extension of the Exclusivity Period will inure to benefit of the Debtor’s estate, creditors, and other key stakeholders. This factor weighs in favor of granting this Motion.

(v) The Debtor has Demonstrated Reasonable Prospects for Filing a Viable Plan.

38. The Debtor has a viable business, which continues to generate sufficient revenue to pay its postpetition accounts payables. If a global settlement with the United States can be reached, there is no reason to believe that the Debtor will not be viable going forward and will be able to file a viable plan. This factor also supports an extension of the Exclusivity Periods.

(vi) The Debtor has Made Progress in Negotiations with its Creditors.

39. As discussed, the Debtor is making progress in its negotiations with the United States. This factor weighs strongly in favor of granting this Motion.

(vii) Only a Small Amount of Time has Elapsed Since the Petition Date.

40. This is the Debtor’s first motion for an extension of the Exclusive Periods, and only four (4) months have passed since the Petition Date. Given the scope of the issues between the Debtor and the United States, and the importance of their resolution to the Debtor, four (4) months is a relatively small amount of time. Although the data is not recent, the General Accounting

Office reported that False Claims Act cases where the United States intervened “took a median of 38 months to conclude,” and the time ranged from “4 months to 187 months” to be resolved. *See* General Accounting Office, Information on False Claims Act Litigation, *available at* chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.gao.gov/assets/gao-06-320r.pdf. Thus, under the circumstances, four months is a “small amount” of time. Therefore, this factor supports the requested extension.

(viii) The Debtor is Seeking an Extension of Exclusivity to Best Position Its Estate for Reorganization, and Not to Pressure Creditors to Submit to Its Reorganization Demands.

41. The Debtor’s request for an extension of the Exclusive Periods is not a tactical decision aimed at pressuring creditors to accept the Debtor’s goals and objectives related to a plan of reorganization. To the contrary, the Debtor’s sole creditor, other than the United States, is a partner in the negotiations with the United States. Therefore, this factor does not weigh against the Court granting this Motion.

(ix) An Unresolved Contingency Exists.

42. The Debtor’s current potential plan of reorganization anticipates a global resolution between the Debtor and the United States, and until terms and conditions of such global resolution can be settled, it is premature to file a plan of reorganization. Rather, it is in the best interests of the Debtor’s estates, its creditors, and other parties in interest for the Debtor to continue its efforts to finalize a global settlement with the United States. This factor weighs squarely in favor of granting the Motion.

43. Accordingly, for the reasons set forth herein, the Debtor submits that “cause” exists to extend the Exclusive Periods and respectfully request that the Court grant the relief requested herein.

VI. NOTICE

44. The Debtor has provided notice of this Motion to the following parties or their respective counsel: (a) the U.S. Trustee for the Southern District of Texas; (b) the holders of the twenty (20) largest unsecured claims against the Debtor; (c) the Office of the United States Attorney for the Southern District of Texas; (d) the United States, acting by and through the Secretary of the Department of Health & Human Services and the Centers for Medicare & Medicaid Services; (e) the Attorney General of the United States; and (f) any party that has appeared electronically in this Case and/or requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtor submits that no other or further notice is required.

VII. NO PRIOR REQUEST

45. No prior request for the relief sought in this Motion has been made to this Court or any other Court.

VIII. CONCLUSION

WHEREFORE, the Debtor respectfully requests entry of the Proposed Order: (i) granting the relief requested herein; and (ii) granting the Debtor such other and further relief as the Court deems just and proper.

Dated: February 18, 2025

Respectfully submitted,

/s/ Casey W. Doherty, Jr.

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Counsel to the Debtor and Debtor in Possession

CERTIFICATE OF ACCURACY

This is to certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to LBR 9013-1(i).

/s/ Casey W. Doherty, Jr

Casey W. Doherty, Jr.

CERTIFICATE OF SERVICE

This is to certify that I have on February 18, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey W. Doherty, Jr

Casey W. Doherty, Jr.

EXHIBIT A

(Proposed Form of Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**ORDER GRANTING DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING ITS
EXCLUSIVE PERIOD FOR THE FILING OF A CHAPTER 11 PLAN
PURSUANT TO § 1121(D) OF THE BANKRUPTCY CODE**

Upon consideration of the Motion² of Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the “Debtor”) in the above-captioned case (the “Case”) for entry of an order (this “Order”), pursuant to § 1121(d) of title 11 of the United States Code, §§ 101 *et seq.* (the “Bankruptcy Code”),³ for entry of an order (a) extending the periods during which the Debtor has the exclusive right to (i) file a chapter 11 plan (the “Exclusive Filing Period”), and (ii) solicit acceptances thereof (the “Exclusive Solicitation Period” and, together with the Exclusive Filing Period, the “Exclusive Periods”), in each case, by 120 days, from February 18, 2025 and April 21, 2025 to June 18, 2025 and August 19, 2025, respectively, without prejudice to the Debtor’s rights to request further extensions of such periods in accordance with §1121(d), and (b) granting the Debtor such other and further relief as is just; and upon the record in this Case; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being core under 28 U.S.C. § 157(b); and that this Court may enter a final order consistent with Article III of the United States Constitution; and

¹ The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

³ All references to “§” or “section” herein are to sections of the Bankruptcy Code.

this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estates, its creditors, and other parties in interest; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having found that the Debtor's notice of the Motion and opportunity for hearing on the Motion were appropriate under the circumstances and that no other notice be provided; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing thereon establish just cause for the relief granted herein; and upon all of the proceedings before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted in full.
2. Pursuant to § 1121(d), the Debtor's Exclusive Filing Period in which to file a chapter 11 plan is extended from February 18, 2025 to and including June 18, 2025.
3. Pursuant to § 1121(d), the Debtor's Exclusive Solicitation Period in which to solicit acceptances of its chapter 11 plan is extended from April 21, 2025 to and including August 19, 2025.
4. The extensions of the Exclusive Periods granted herein are without prejudice to the Debtor's rights to seek from this Court further extensions of time pursuant to § 1121(d).
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Debtor is authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.
7. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025

Christopher M. Lopez
United States Bankruptcy Judge